

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

04 CR 10246 PBS

UNITED STATES OF AMERICA	)	CRIMINAL NO.
	)	
v.	)	VIOLATION:
	)	
BRIAN TODD and	)	18 U.S.C. § 2113(b) --
SHAUN TODD	)	Bank Larceny
	)	

INDICTMENT

COUNT ONE: (18 U.S.C. § 2113(b) -- Bank Larceny)

The Grand Jury charges that:


On or about October 16, 2000, at Wilmington, in the District of Massachusetts,

BRIAN TODD and SHAUN TODD, defendants herein, did take and carry away, with intent to steal and purloin, money exceeding \$1,000 belonging to, or in the care, custody, control, management, or possession of a bank, to wit: \$100,000 from an automated teller machine at 223 Lowell Street in Wilmington, Massachusetts.

All in violation of Title 18, United States Code, Sections 2113(b) and 2.


**A TRUE BILL**

  
FOREPERSON OF THE GRAND JURY

  
DONALD L. CABELL  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; 8-18, 2004.

Returned into the District Court by the Grand Jurors and  
filed.

  
DEPUTY CLERK  
8/18/04  
(WKS) 11:45

JS 45 (5/97) - (Revised USAO MA 3/25/02)

04 CR 10246 PBS

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: \_\_\_\_\_ Category No. II Investigating Agency FBICity Wilmington Related Case Information:County Middlesex Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number 04-1010-JGD  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Brian Todd Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date: 1976 SS#: 4566 Sex: M Race: White Nationality: AmericanDefense Counsel if known: Scott F. Gleason Address: 163 Merrimack  
Haverhill, MA

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Donald L. Cabell Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody

## Location Status:

Arrest Date: March 9, 2004☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by M.J. Judith Dein on March 9, 2004Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: August 18, 2004Signature of AUSA: Donald L. Cabell

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Brian Todd

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §2113(b)</u>	<u>Bank Larceny</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: FBI

CR 1 0240 PBS

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: \_\_\_\_\_ Category No. II Investigating Agency FBICity Wilmington Related Case Information:County Middlesex Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New Defendant \_\_\_\_\_  
Magistrate Judge Case Number 04-1009-JGD  
Search Warrant Case Number \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Shaun Todd Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address \_\_\_\_\_

Birth date: 1978 SS#: 2739 Sex: M Race: White Nationality: AmericanDefense Counsel if known: Scott F. Gleason Address: 163 Merrimack  
Haverhill, Mass.

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Donald L. Cabell Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody

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Continue on Page 2 for Entry of U.S.C. Citations

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**04 CR 1 0246 PBS**

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Shaun Todd

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Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: FBI